REMARKS

CLAIM REJECTIONS UNDER 35 U.S.C. § 112

In paragraph 1 and 2 of the above-mentioned Office Action, claims 1-25 were rejected under 35 U.S.C. § 112, first paragraph because claims 1, 13 and 25 recite "in response to the second signal, the bridge sending a third signal to the computer system to indicate that the *bridge* has been removed . . . " (emphasis added). Claims 1, 13, and 25 are being amended to recite "in response to the second signal, the bridge sending a third signal to the computer system to indicate that the *device* has been removed . . . " (emphasis added). Withdrawal of this rejection is respectfully solicited.

REJECTIONS UNDER 35 U.S.C. § 102 – Hendry

In paragraphs 3 and 4, claims 1, 6-13, and 18-25 were rejected under 35 U.S.C. § 102(e) as being anticipated by US patent number 6,757,850 issued to Hendry ("Hendry"). The rejection of these claims is traversed. Hendry does not disclose every element of the claimed inventions.

Claim 1 is patentably distinguished from Hendry for at least the features regarding the cleanup state. In this regard, claim 1 recites "while in the cleanup state, performing the *order steps* of the bridge sending a first signal to the computer system; . . . the computer system sending a second signal to the bridge; and . . . , the bridge sending a third signal to the computer system . . ." (emphasis added), which is not disclosed, suggested, or made obvious by Hendry.

The Office Action cited the claimed bridge to Hendry's device manager, the claimed device to Hendry's PC cards, and the claimed computer system to Hendry's display manager. As a result, to be parallel with claim 1 in the cleanup state, Hendry

must have disclosed that, while in the cleanup state, there are the order steps that Hendry's device manager sends a first signal to the display manager; the display manager sends a second signal to the device manager; and the device manager sends a third signal to the display manager. Apparently, Hendry does not disclose such facts. In reality, in the cited paragraph of col. 2, lines 29-39 of Hendry "[w]hen an input/output is added to or removed from the computer system, an interrupt signal informs the device manager of the fact . . . . In response thereto, the device manager determines whether the changed component relates to the computer's display function . . . If so, the device manager makes a call to the . . . display manager . . . . In response to this call, the display manager reconfigures the display space . . . ." In this cited paragraph, Hendry's interrupt signal does correspond to the claimed first signal because Hendry's interrupt signal informs *the device manager* (the claimed bridge) while the claimed first signal is *from the claimed bridge to the computer system* (Hendry's display manager).

Further, for the sake of argument that even if Hendry's device manager making a call to the display manager with a signal corresponding to the claimed first signal, then Hendry fails to disclose the second signal in response to the first signal and the third signal in response to the second signal from the display manager to the device manager and from the device manager to the display manager, respectively.

The Office Action also asserted that Hendry's col. 2, lines 35-36 discloses the video driver sends the 1st signal to display manager 22, and in col.. 2, lines 39-42, in response to the first signal, the display manager sends the 2nd signal back to the video driver for configuration of the display. It is respectfully submitted that Hendry's col. 2, lines 35-36 does not disclose the video driver sending the 1st signal to the display manager 22, but discloses that "it [the device manager] may determine whether an added device is a video card. If so, the device manager makes a call to the computer's

display manager . . . ." As such, there is nothing about the video driver, the 1st signal, or the video driver sending the first signal to the display manager. Further, Hendry's col. 2, lines 39-42 does not disclose that the display manager sends the 2nd signal back to the video driver for configuration of the display, but discloses that "the display manager reconfigures the display space for the computer system . . . ." Again, as can be seen, there is nothing about the display manager, the 2nd signal, the device driver, or the display manager sending the 2nd signal to the video driver. For the sake of argument that, even if there is the fact that the video driver sending the 1st signal to the display manager, and, in response, the display manager sends the 2nd signal to the video driver, claim 1 is still patentably distinguished from these set of facts because the video driver does not correspond to the claimed bridge. Equally important, those sets of facts do not disclose the third signal being sent from device manager (the bridge) to the computer system (the display manager).

For the forgoing reasons claim 1 is patentably distinguished from Hendry and is therefore patentable.

Claims 2 -12 depend from claim 1 and are therefore patentable for at least the same reasons as claim 1. Claims 2-12 are also patentable for their additional limitations.

Regarding claim 6, to be parallel with the claimed invention, Hendry must disclose that if the device manager receives a processing command, the device manager sends a fourth signal to the display manager indicating the device manager cannot process the command. However, the cited paragraph of col. 7, line 66 to col. 8, line 12 discloses that ". . . if an attempt is made to address memory in a video device, e.g., a frame buffer, the resulting condition is treated as an interrupt. This interrupt is relayed to the display manager to cause it to reconfigure the display environment . . . ." As can be seen, there is no disclosure regarding the device

manager receiving a processing command. For the sake of argument that Hendry's cited interrupt signal corresponds to the claimed fourth signal, there is no disclosure that this interrupt signal being sent to the display manager indicating the device manager cannot process the processing command.

Regarding claim 7, the cited paragraph of Hendry does not disclose a processing command, a fifth signal or the device manger sending the fifth signal to the display manager indicating that the command has been terminated, as in the claimed invention.

Regarding claim 8, the cited paragraph of Hendry does not disclose a fourth signal, a fifth signal, a six signal, or upon receiving the fourth or the fifth signal form the device manager, the display manager provides the sixth signal to indicate that the command cannot be processed.

Regarding claims 9, 10, and 11, for the sake of argument that Hendry's sensor 46 corresponds to the claimed buffer, sensor 46 is not *between* the PC card and the display manager as in the claimed invention.

Regarding claim 12, the cited paragraph of col. 5, lines 15-30 does not disclose the control pin of the device manager, the control pin of the PC card, the signal asserted at the control pin of the device manager, the device manager recognizes that the PC card has been removed from the device manager based on the signal asserted at the control pin of the device manager, or the signal changes when the control pin of the device manger is engaged to or disengaged from the control pin of the PC card, as in the claimed invention.

Claim 25 recites limitations corresponding to claim 1 distinguished from Hendry as discussed above. Claim 25 also recites limitation regarding a buffer between the device and the bridge as discussed above in relation to claims 9-11. Therefore, claim 25 is patentable for at least these limitations.

REJECTIONS UNDER 35 U.S.C. § 103 – Hendry and Mosgrove

In paragraphs 5 and 6, claims 2-5 and 14-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hendry in view of US patent number 6,418,493 issued to Mosgrove ("Mosgrove"). The rejection is traversed. Hendry and Mosgrove, either alone or in combination, do not teach every element of the claimed inventions. The alleged motivation for combing Hendry and Mosgrove was improper. Showing a prima facie of obviousness failed.

For the rejection based on combining Mosgrove with Hendry to stand, Mosgrove must teach every element not taught in Hendry as discussed above. However, Mosgrove does not teach such elements. Consequently, Hendry and Mosgrove, either alone or in combination, do not teach every element of claims 2-5.

The Office Action asserted that Hendry, col. 3, lines 21-50, and Mosgrove, col. 2, lines 6-15, disclose that the bridge using a first protocol to communicate with the computer system, and using a second protocol to communicate with the device. It is respectfully submitted that carefully reviewing the cited paragraphs does not reveal such assertion for at least the reason that there is no disclosure regarding the device manager using a first protocol to communicate with the display manager and using a second protocol to communicate with the PC card.

The Office Action also asserted that "[i]t would have been obvious . . . to incorporate Mosgrove's teaching into Hendry's system so as to reduce the effects of when the dynamic bus system is reconfigured (col. 2, lines 28-49)." Even though the cited paragraph of Mosgrove discusses that difficulty arises when the dynamic bus system is reconfigured, there is no teaching in either Hendry or Mosgrove that suggest combining the two teaching to reduce "the effects of when the dynamic bus system is reconfigured" as asserted. It is not of common knowledge to combine the two

teachings either. Therefore, the alleged motivation for combining Mosgrove into Hendry is improper. Showing a prima facie case of obviousness fails.

Regarding claims 3-5, it is assumed that the cited paragraphs of col. 3, lines 43-50 and 56-64 and col. 4, lines 34-35 are of Mosgrove, not Hendy's as indicated in the Office Action. Even though the paragraph of col. 3, lines 43-50 discloses the standard for implementing the dynamic bus, there is no teaching that those standards are used in the first protocol and the second protocol for communicating between device manager and the display manager, and between the device manager and the PC card in Hendry. Therefore, the alleged motivation for combining Mosgrove into Hendry is improper. Showing a prima facie case of obviousness fails.

For the foregoing reasons, claims 2-5 are patentable for their additional limitations.

Claims 13-24 recite limitations corresponding to claims 1-12, and are therefore patentable for the same reasons as claims 1-12.

SUMMARY

In conclusion, it is respectfully submit that pending claims 1-25 clearly present subject matter that is patentable over the prior art of record, and therefore withdrawal of the rejections and issuance of the Application is respectfully solicited.

Respectfully submitted,

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